

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

*Plaintiff,*

v.

**TIMOTHY BARTON ET AL.,**

*Defendants,*

**DJD LAND PARTNERS, LLC, and  
LDG001, LLC,**

*Relief Defendants.*

**CASE NO. 3:22-cv-2118-X**

**SOUTHERN PROPERTIES CAPITAL, LTD.'S MOTION FOR INTERVENTION**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE BRANTLEY STARR:

Southern Properties Capital, Ltd. (“SPC”) files this Motion for Intervention (“Motion”) to intervene in this action and oppose the relief sought by the Receiver in Receiver’s Verified Motion for Appointment of Appraisers, Approval of Appraisals, Approval Hearing, and Approval of Sale of Parc at Windmill Farms [Docket No. 161] and Receiver’s Verified Motion for Appointment of Appraisers, Approval of Appraisals, Approval Hearing, and Approval of Sale of Bellwether Ridge [Docket No. 164] (collectively, Receiver’s “Motions”).

SPC files its Motion under Rules 24(a) and 24(b)(1) of the Federal Rules of Civil Procedure. Pursuant to Local Rule 7.1(d), SPC’s contentions of fact and law, arguments, and authorities supporting this Motion are set forth in the Memorandum in support of SPC’s Motion.

**RESPECTFULLY SUBMITTED BY:**

/s/ C. Gregory Shamoun

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**CERTIFICATE OF CONFERENCE**

The undersigned certifies that on March 3, 2023, counsel for the SPC conferred with counsel for the Receiver, Charlene Koonce, who responded that the Receiver is not opposed to SPC intervention.

Certified to the 10th day of March, 2023.

/s/ J. Blair Norris

**J. BLAIR NORRIS**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2023, I filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, Dallas Division using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record, who have consented in writing to accept this Notice as service of the document by electronic means.

/s/ J. Blair Norris

**J. BLAIR NORRIS**